

IN THE UNITED STATES DISTRICT COURT FOR  
THE WESTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA

v.

AZAD KHIZGILOV

Criminal No. 17-335

**DEFENDANT AZAD KHIZGILOV'S MOTION  
TO FILE SENTENCING SUBMISSION UNDER SEAL**

The defense respectfully submits this motion on behalf of defendant Azad Khizgilov to request, *with the consent of the Government*, that Mr. Khizgilov be permitted to file his sentencing submission under seal. The instant request is made for the following reasons:

1. Mr. Khizgilov is presently scheduled to be sentenced by this Court on September 24, 2021.
2. The defense intends to file a sentencing submission on behalf of Mr. Khizgilov on or before this Friday, September 17, 2021, which will contain sensitive personal information relating to the medical condition of both Mr. Khizgilov and others.
3. Because such sensitive information will be referenced throughout the entirety of Mr. Khizgilov's sentencing submission, the defense seeks permission to file the entire submission under seal.
4. The defense has conferred with Assistant U.S. Attorney Brendan Conway regarding this request, and he consents to it on behalf of the Government.

WHEREFORE defendant Azad Khizgilov respectfully requests that the Court grant this motion permitting Mr. Khizgilov to file his entire sentencing submission under seal.

Dated: New York, New York  
September 15, 2021

Respectfully Submitted,

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/s/ Chad Seigel

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cc: AUSA Brendan Conway